

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC BANK, National Association, successor in	)	
interest to National City Bank, successor by merger	)	
to MidAmerica Bank, FSB,	)	
	)	
Plaintiff,	)	Case No.: 14-cv-03256
	)	
v.	)	Assigned Judge: Elaine E. Bucklo
	)	
JAMES D. WILSON, an individual; and JOYCE A.	)	Property Address: 1598 Currier Road,
SZELIGA, an individual;	)	Freeport, Illinois 61032
	)	
Defendants.	)	

**PLAINTIFF'S RULE 55 MOTION FOR  
ENTRY OF JUDGMENT OF FORECLOSURE AND SALE**

Plaintiff, PNC BANK, National Association, successor in interest to National City Bank, successor by merger to MidAmerica Bank, FSB ("Plaintiff"), by and through its attorneys, Kenneth S. Strauss and Michael A. Jacobson of ARNSTEIN & LEHR LLP, states in support of this Motion for Entry of Judgment of Foreclosure and Sale against defendants, JAMES D. WILSON, an individual ("Wilson") and JOYCE A. SZELIGA, an individual ("Szeliga"):

1. Plaintiff filed its single-count Complaint to Foreclose Mortgage and For Other Relief (the "Complaint") on May 5, 2014. The Complaint seeks foreclosure of the "Mortgage" (as that term is defined in the Complaint).

2. Concurrently with this Motion for Entry of Judgment of Foreclosure and Sale, this Court entered a default order against Wilson and Szeliga for their failure to defend or deny the allegations set forth in the Complaint.

3. Plaintiff's claim for damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Affidavit of Amounts Due and Owing, attached hereto as Exhibit A, and expressly incorporated herein.

4. Plaintiff's attorneys' fees and court costs are more specifically set for in its supporting Affidavit of Attorneys' Fees, attached hereto as Exhibit B, and expressly incorporated herein.

5. Plaintiff's Loss Mitigation Affidavit is attached hereto as Exhibit C, and expressly incorporated herein.

6. A proposed order for Judgment of Foreclosure and Sale is attached hereto as Exhibit D, and expressly incorporated herein.

7. Plaintiff is entitled to a Judgment of Foreclosure and Sale as a matter of law.

WHEREFORE, Plaintiff, PNC BANK, National Association, successor in interest to National City Bank, successor by merger to MidAmerica Bank, FSB, respectfully requests that this Honorable Court:

(a) Enter the proposed Order Judgment of Foreclosure and Sale, attached hereto as Exhibit D; and

(b) For such other and further relief this Honorable Court deems just and proper.

Respectfully submitted,

PNC BANK, National Association,  
successor in interest to National City  
Bank, successor by merger to  
MidAmerica Bank, FSB, Plaintiff

By: /s/ Michael A. Jacobson

One of Its Attorneys

Mr. Kenneth S. Strauss (ARDC No. 6273118)  
Mr. Michael A. Jacobson (ARDC No. 6313122)  
Arnstein & Lehr LLP  
*Attorneys for Plaintiff*  
120 South Riverside Plaza, Suite 1200  
Chicago, Illinois 60606  
T: (312) 876-7100  
F: (312) 876-6299